

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

DATE:

SUBJECT: ACTION MEMORANDUM: Authorization to Extend the Period of Performance for Remedial Design and Request an IAG Amendment to fund the remainder of the Supplemental Site Investigation and Risk Assessment for the Himco Dump Site, Elkhart, Indiana

FROM: William E. Muno, Director
Superfund Division

TO: Francis X. Lyons
Regional Administrator

Purpose:

The purpose of this action is to provide additional funding and to extend the period of performance for the Interagency Agreement (IAG) # DW96947722-01-4 with the U.S. Army Corps of Engineers (USACE) to conduct the Phase II Supplemental Site Investigation and revised Risk Assessment to support Remedial Design at the Himco Dump Superfund Site in Elkhart, Indiana.

Background/Current Status:

The Himco Dump site is a closed 48-acre landfill, located at County Road 10 and the Nappanee Street Extension in Cleveland Township, adjacent to the City of Elkhart, Elkhart County, Indiana. The site is located approximately two miles north of the St. Joseph River which runs east-west through the City of Elkhart.

The landfill area is covered with a layer of sand, under which is a layer of white, powdery, calcium sulfate. The western half of the landfill cover is vegetated with grasses; the eastern half with grasses, bushes, and young trees. The Construction Debris Area (CDA), located south of the landfill and north of County Road 10, contains many small piles of rubble, concrete, asphalt, and metal debris.

A Record of Decision (ROD), signed on September 30, 1993, specified the following:

- Construction of a composite barrier, solid waste landfill cover (cap) over the landfill proper and the CDA;
- Use of institutional controls on landfill property to limit land and groundwater use;
- Installation of an active landfill gas collection system including a vapor phase carbon system to treat the off-gas from the landfill. An enclosed ground flare system will be implemented if landfill gas characterization studies indicate VOC emissions exceed ARARs (Indiana Administrative Code 326 IAC); and,

- Monitoring of groundwater to ensure effectiveness of the remedial action and to evaluate the need for future groundwater treatment.

Data collected in 1995 indicate that ground water contamination levels remain low and that site conditions are relatively steady-state with respect to ground water contamination. The cancer slope factors and risk assessment policies implemented subsequent to the original risk assessment suggest the original 1992 baseline risk assessment (BRA) may have been over-estimated risks at the site, hence the risk assessment needs to be re-evaluated before proceeding with remedial actions. The Supplemental Site Investigation is intended to provide the additional data needed to recalculate the site-related risks. The investigation includes collection of groundwater samples from selected wells and soil samples from within the CDA. In addition, due to the potential for migration of vinyl chloride ahead of methane, soil gas samples at the perimeter and beyond the perimeter (as needed) of the landfill must be collected and analyzed for chlorinated VOCs and BTEX due to the proximity of potential human receptors. These contaminants had been previously detected in gas from the landfill proper. The soil gas analyses need to be specially contracted out by the USACE. The results of all analyses will be combined with data from the RI (as appropriate) and run through a revised risk evaluation. The result will either provide a basis for a ROD amendment or support the existing AR for the current remedy.

Estimated Project Cost and Schedule:

To date, U.S.EPA Region 5 has allocated a total of \$820,700 for pre-design studies to support a remedial design to place a multi-layer geocomposite/ geosynthetic cover system with an active landfill gas collection and treatment system, including a site operations, maintenance and monitoring plan. In addition, these funds paid for supplemental site investigation work, reassessment of risk and residual remedial design work for the Construction Debris Area. This action requests an additional \$81,000, of which \$29,320 will be used to award and fund the Soil Gas Analytical Contract and \$51,680 to conduct the soil gas sample collection at the Site. This funding request supports work which will better characterize site risks, particularly those due to soil gas contaminant migration. Such information is critical to the recalculation of risks at the site and may significantly affect future remedial actions at the Site. This funding is provided in the FY 1998 Superfund Comprehensive Accomplishments Plan (SCAP). The funds provided are necessary to complete the remedial design activities which are documented in the addendum to the Scope of Work (SOW).

The period of performance should be extended from December 31, 1998 to December 31, 1999, to allow for full completion of all data collection, evaluation, risk recalculation and remaining remedial design work. Region 5 has identified an additional \$81,000 in remedial design funds to allocate to this supplemental investigation and risk assessment work.

The Remedial Project Manager has reviewed these cost and time requirements and has found them to be reasonable and necessary for the work being performed.

Allocation Methodology:

Goal 05 - Better Waste Management, Restoration of Contaminated Wastes, and Emergency

Response

Objective 01 - Reduce or control risks to human health

Subobjective 02 - Respond to Superfund Hazardous Waste Sites

Program Results Code: 50102D - 100% - Amount \$81,000

Recommendation:

This request has been planned and coordinated with the appropriate offices in the Region. Funds in the amount of \$81,000 have been made available for this project from RD funds in the FY 1999 Superfund Comprehensive Accomplishments Plan (SCAP). I recommend that these funds be authorized and the project period of performance be extended to December 31, 1999 for continuing the RD activity at the Himco Dump Superfund Site in Elkhart, Indiana. Attached for your signature is the Commitment Notice for this action.

Attachments